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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
FILED UNDER SEAL**

This Document Relates to:  
  
ALL CASES

**TO THE COURT, THE PARTIES, AND ALL COUNSEL OF RECORD:**

Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs hereby move the Court to consider whether certain materials should be sealed. Plaintiffs file these materials under seal because they have been produced and marked confidential or contain references to documents produced and marked confidential by Uber.

**Material To Be Filed Under Seal**

The materials to be filed under seal are declarations and exhibits filed pursuant to the Court's September 22, 2025 order, ECF 3969. Plaintiffs request the Court consider whether the following should be filed under seal:

Document	Description	Designating Party
<b>Exhibit 1</b>	Excerpt of document produced by Defendants, Bates stamped UBER_JCCP_MDL_000031233, designated as Confidential, containing confidential information about Uber's Flack system and non-public employee email addresses	Defendants
<b>Exhibit 2</b>	Excerpt of production letter from counsel for Defendants to counsel for Plaintiffs dated August 19, 2024, containing link to secure file transfer and user name.	Defendants
<b>Exhibit 3</b>	Draft Joint Discovery Letter Brief Relating to Safety Data	Defendants
<b>Exhibit 4</b>	Excerpts of transcript of April 25, 2025 Rule 30(b)(6) deposition of Defendants by Todd Gaddis, containing confidential information about Uber's Flack system	Defendants
<b>Exhibit D</b>	Email correspondence between the Parties dated July 31 – August 5, 2025	Defendants
<b>Exhibit E</b>	Correspondence between the Parties dated August 7 – September 15, 2025	Defendants
<b>Exhibit F</b>	Letter dated January 16, 2024 from counsel for Defendants to counsel for Plaintiffs pursuant to the Court's January 9, 2024 Order	Defendants

Document	Description	Designating Party
<b>Exhibit G</b>	Letter dated February 22, 2024 from counsel for Defendants to counsel for Plaintiffs responding to Plaintiffs' January 29, 2024 letter	Defendants
<b>Exhibit H</b>	Email correspondence between the parties dated April 19 – May 10, 2024	Defendants
<b>Exhibit I</b>	January 18, 2024 declaration of Katherine McDonald	Defendants
<b>Exhibit K</b>	Correspondence from counsel for Defendants to counsel for Plaintiffs dated June 21, 2024	Defendants
<b>Exhibit N</b>	Certification of Katherine McDonald dated January 10, 2025	Defendants
<b>Exhibit O</b>	Certification of Katherine McDonald dated February 25, 2025	Defendants
<b>Exhibit P</b>	Certification of Katherine McDonald dated March 6, 2025	Defendants
<b>Exhibit Q</b>	Exhibit to April 24, 2025 JCCP deposition of Katherine McDonald	Defendants
<b>Exhibit R</b>	Email correspondence between the parties dated April 28 – May 1, 2025	Defendants
<b>Exhibit S</b>	Draft Joint Discovery Letter Brief Relating to Safety Data	Defendants
<b>Exhibit T</b>	Excerpts of transcript of April 25, 2025 Rule 30(b)(6) deposition of Defendants by Todd Gaddis, containing confidential information about Uber's Flack system	Defendants
<b>Exhibit X</b>	Excerpts of transcript of April 24, 2025 deposition of Katy R. McDonald, designated as Highly Confidential – Attorneys' Eyes Only, containing confidential information about Uber's Bliss and Jira systems	Defendants
<b>Exhibit Y</b>	Excerpts of transcript of April 25, 2025 Rule 30(b)(6) deposition of Defendants by Katy R. McDonald, designated as Highly Confidential – Attorneys' Eyes Only, containing confidential information about Uber's Flack system	Defendants

Document	Description	Designating Party
<b>Exhibit Z</b>	Excerpt of transcript of April 25, 2025 Rule 30(b)(6) deposition of Defendants by Hannah Nilles, designated as Highly Confidential – Attorneys’ Eyes Only, containing confidential information about Uber’s Flack system	Defendants

Under Local Rule 79-5(f)(3), the Designating Party bears responsibility to establish that all of the designated material is sealable, and must “file a statement and/or declaration as described in subsection (c)(1)” of the Local Rules.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Roopal P. Luhana in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: September 23, 2025

Respectfully submitted,

By: /s/ Roopal P. Luhana

Roopal P. Luhana

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